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To: CEQA Guidelines
Subject: LOS alternatives

The December 30, 2013 draft discussion is an excellent start for improving traffic impact analyses. It did not recognize that existing conditions definitions are not very precise. Traffic changes daily and one or two day counts of existing traffic are not very precise. Thus building LOS analyses on this weak foundation is fundamentally flawed.

I tend to prefer the VMT based assessment as it is simple and the relationship of VMT to network lane miles provides a good overview of impacts. This approach would need trip generation and vehicle trip length estimates. Unclear if it should be average annual VMT, Weekday VMT or peak hour VMT. Length distribution differs for inner city areas versus edge city profiles and therefore some methodology other than regional traffic models might be needed to estimate VMT. Perhaps this is an area for future research.

Auto trips generated ignores trip length and therefore is not as good as the VMT based approach. The MMLOS approach is complicated and might not be easy for public to understand.

Vehicle hours traveled also overly complicates analyses and invites gaming. Speed is not critical to impacts.

Perhaps vehicle trip generation estimates should be based on off-street parking provided more so than dwelling units or GSF. How to treat on street parking would need to be defined. I tend to like a parking based trip gen approach.

It is likely that attorneys will challenge the difference between CEQA, NEPA, CMP, developer traffic impact fees and other traffic study needs. Hopefully the reformed CEQA approach would provide a template for reforming other traffic studies. Frankly the CMP requirements should be eliminated as they fail to address the spirit of Prop 111.

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